

EXHIBIT "C"

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

YOLANDA R. EFFINGER

Plaintiff,

v.

WINN DIXIE MONTGOMERY, INC.

Defendant.

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Case No. 2:07-CV-657-ID-TFM

PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION TO
DEFENDANT WINN DIXIE MONTGOMERY, INC.

Now comes Plaintiff and propounds the following requests for Production to Defendant Winn Dixie Montgomery, Inc., to wit:

1. Attach a written list or other record of all agents or employees of defendant together with their job title, who worked at defendant's store where plaintiff fell on August 20, 2006?

A.

2. Attach a copy of defendant's store maintenance or janitorial policy or procedure in effect on August 20, 2006?

A.

3. Attach a copy of any incident or accident report which defendant or its agents or employees prepared with regard to plaintiff's fall of August 20, 2006 as referenced in

her complaint.

A.

4. Attach copies of any witness statements regarding plaintiff's fall of August 20, 2006 as referenced in her complaint.

A.

5. Attach copies of any statement, written or oral, made by plaintiff regarding her fall of August 20, 2006 or regarding any matter raised by her complaint?

A.

6. Attach copies of any computer record or, electronic data or media within defendant's possession which supports its defenses raised in or by its answer.

A.

7. Attach a complete list of all fact witnesses defendant expects to call at trial, including their addresses and occupations.

A.

8. Attach a complete list of all expert witnesses defendant expects to call at trial, including their addresses and occupations.

A.

9. Attach all documents obtained by defendant by reason of third party subpoenas it has issued under Rule 45 of the Federal Rule of Civil Procedures in this case.

A.

10. Attach copies of all documents which support any defenses raised by defendant.

A.

11. Attach any photographs within defendant's possession pertaining to claims and defenses raised by the parties in this case.

A.

12. Attach any surveillance tape or other video tape made of plaintiff's fall or the area of her fall on August 20, 2006.

A.

13. Attach each and every incident report involving falls suffered by defendant's customers at the location of plaintiff's fall for 2005 and 2006?

A.

14. Attach each and every claim for "slip and fall" injury by defendant's

customers at the location of plaintiff's fall for 2005 and 2006?

A.

15. Attach each and every court complaint for "slip and fall" injury by defendant's customers at the location of plaintiff's fall for 2005 and 2006?

A.

16. Attach each and every deposition given by defendant or its agents or employees in "slip and fall" claims filed by its customers at the location of plaintiff's fall for 2005 and 2006.

A.

17. Attach each and every building code violation or OHSA violation received by defendant covering its store where plaintiff fell over the past three (3) years.

A.

18. Attach copies of all building or construction plans covering renovations or changes made to the area where plaintiff fell, especially those covering floors, cash registers, and grocery carts after August 20, 2006.

A.

19. Attach any document or thing which defendant intends to offer as evidence at trial.

A.

This 31st day of October, 2007.

/s/ Ronald B. Hatcher
Ronald B. Hatcher (HAT 002)
Attorney for Plaintiff

P. O. Box 161442
Atlanta, GA 30321
(404) 526-9440

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Plaintiff's First Set of Requests for Production to Defendant were served on Defendant's Attorney, via e-mail transmission and by Federal Express, at the following address, to wit:

Atty. Randall Morgan
Hill, Hill, Carter, Franco, Cole, & Black, PC
425 South Perry Street
Montgomery, AL 36104

This 31st day of October, 2007.

/s/ Ronald B. Hatcher
Ronald B. Hatcher (HAT 002)
Attorney for Plaintiff